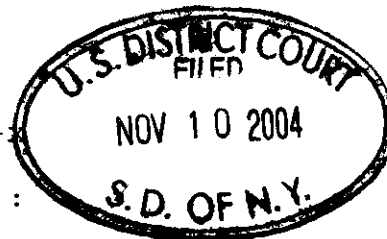


RB

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

-v-

INDICTMENT

04 Cr.

LIM SHANG,  
a/k/a "Ah Ho,"  
a/k/a "Lo Ban,"  
a/k/a "Lin He,"  
CHEN SHENG,  
a/k/a "Lo Ma,"  
a/k/a "Xiao Ma,"  
YI TIAN ZHENG,  
a/k/a "Yi Tian,"  
LI YAN,  
a/k/a "Wai Sum Yu,"  
a/k/a "Ah Fung,"  
a/k/a "Tony,"  
LI GUO QIU,  
a/k/a "Jimmy,"  
CHEN YAN QING,  
a/k/a "Yan Qing,"  
a/k/a "Ah Sheng,"  
FNU LNU,  
a/k/a "Ah Liang,"  
MA YU DONG,  
a/k/a "Ah Dong,"  
ZHANG XIU QIAO,  
a/k/a "Duck Egg Chow,"  
FNU LNU,  
a/k/a "Andy,"  
FNU LNU,  
a/k/a "Ah Ling,"  
FNU LNU,  
a/k/a "Jiang Li Ming,"  
a/k/a "William Chen,"  
QIU XING GUO,  
a/k/a "Yi Guo,"  
FNU LNU,  
a/k/a "Li Zi,"  
FNU LNU,  
a/k/a "Sister Ying,"  
FNU LNU,  
a/k/a "Dong Gua,"  
FNU LNU,  
a/k/a "Wu Hai,"  
FNU LNU,  
a/k/a "Aunt Wan Zheng,"  
LIN JIE,  
FNU LNU,  
a/k/a "Lao Zhong,"

**04CRIM. 1205**

**JUDGE JONES**

LIAO MING,	:
LAO CAI,	:
FNU LNU,	:
a/k/a "Ah Wei,"	:
YI DONG,	:
HUINA CHEN,	:
a/k/a "David,"	:
ZHI XIONG QIU,	:
a/k/a "William,"	:
FNU LNU,	:
a/k/a "Zhou Ping," and	:
FNU LNU,	:
a/k/a "Zhong Ge,"	:
Defendants.	:

- - - - -x

**RACKETEERING CHARGES**

**COUNT ONE**

**Racketeering Violation**

The Grand Jury charges:

**The Enterprise**

1. At all times relevant to this Indictment, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong," the defendants, and others known and unknown, were members and associates of an organized criminal enterprise led by LIM SHANG (the "Lim Organization"). The Lim Organization was a criminal organization whose members and associates have engaged in numerous crimes, including attempted murder, conspiracy to commit

murder, extortion, the collection of extensions of credit through extortionate means, illegal gambling, and trafficking in counterfeit goods.

2. The Lim Organization, including its leadership, its membership, and its associates, constituted an "enterprise," as that term is defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity, which was engaged in, and the activities of which affected, interstate and foreign commerce. The Lim Organization was an organized criminal group based in the Chinatown section of Manhattan and the Flushing section of Queens, which operated in the Southern and Eastern Districts of New York, and elsewhere. The Lim Organization constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

#### The Defendants

3. At various times relevant to this Indictment, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong," the defendants, were members and associates of the enterprise, the Lim Organization, and participated in the operation and management of the enterprise.

4. At all times relevant to this Indictment, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," the defendant, was the primary leader of the Lim Organization, who directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs. As the leader of the Lim Organization, LIM SHANG was responsible for, among other things, supervising the criminal activities of the members and associates of the Lim Organization, providing the members and associates of the Lim Organization with support and protection, and resolving disputes with other organized criminal groups in the New York City area. In return for his supervision and protection, LIM SHANG typically received a share of the illegal earnings from the various criminal activities of the members and associates of the Lim Organization. In addition, apart from supervising and directing the criminal activities of the members and associates of the Lim Organization, LIM SHANG also participated directly in the criminal activities of the Lim Organization.

5. At various times relevant to this Indictment, CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong," the defendants, were members and associates of the Lim Organization. Under the direction of the leader of the enterprise, these defendants participated in unlawful and other

activities in furtherance of the conduct of the enterprise's affairs. Among their criminal activities were participation in conspiracies to commit murder, attempts to commit murder, extortion, the use of extortionate means to collect extensions of credit, the operation of illegal gambling businesses, and the trafficking in counterfeit goods. As members and associates of the Lim Organization, CHEN SHENG, YI TIAN ZHENG, LI YAN, LI GUO QIU, CHEN YAN QING, FNU LNU, a/k/a "Ah Liang," and MA YU DONG regularly reported to LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," the defendant.

6. When disputes arose between the Lim Organization and other criminal enterprises in the New York City area, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," the defendant, as the primary leader of the Lim Organization, would be called upon to resolve these disputes. In some instances, LIM SHANG resolved disputes by using threats of violence and actual violence against the members and associates of other criminal groups. LIM SHANG did this, in part, by ordering the members and associates of the Lim Organization, including CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong," to use force against groups and individuals who were perceived as threats to the Lim Organization.

**Purposes of the Enterprise**

7. The purposes of the Lim Organization included the following:

a. Enriching the leaders, members and associates of the Lim Organization through, among other things, (i) extortion; (ii) the use of extortionate means to collect extensions of credit; (iii) the operation and ownership of illegal gambling businesses; and (iv) the sale and distribution of counterfeit goods;

b. Preserving, protecting, and augmenting the power, territory and financial profits of the Lim Organization, its leaders, its members and its associates, through the use of intimidation, threats of violence, and actual violence, including attempted murder, assault, and extortionate collections of debt; and

c. Keeping victims and citizens in fear of the Lim Organization, its leaders, its members and its associates by committing and threatening to commit physical violence and by causing and threatening to cause economic harm.

**Means and Methods of the Enterprise**

8. Among the means and methods by which the defendants and other enterprise members and associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. To protect and expand the enterprise's business and criminal operations, members and associates of the

enterprise threatened to murder and assault, and did attempt to murder and assault, persons who engaged in activity that jeopardized (i) the power and criminal activities of the enterprise, (ii) the power of the leaders of the enterprise, and (iii) the flow of criminal proceeds to the leaders of the enterprise.

b. Members and associates of the enterprise promoted a climate of fear in the community through threats of economic harm and violence.

c. Members and associates of the enterprise generated income for the enterprise through, among other things, (i) extortion; (ii) the use of extortionate means to collect extensions of credit; (iii) the operation and ownership of illegal gambling businesses; and (iv) the sale and distribution of counterfeit goods.

d. Members and associates of the enterprise at times engaged in criminal conduct or coordinated their criminal activities with leaders, members, and associates of other criminal organizations.

e. Members and associates of the enterprise attempted to identify individuals suspected of providing, or deemed likely to provide, information to law enforcement about the enterprise, its members and activities.

f. Members and associates of the enterprise loaned money and extended credit to various individuals, including customers of the enterprise's illegal gambling

businesses, and used, and threatened to use, force and physical violence against those individuals to compel them to repay the enterprise.

g. To conceal their receipt of money generated from their criminal activities, members and associates of the enterprise concealed their ownership of various assets that were purchased with proceeds of their criminal activities.

**The Racketeering Violation**

9. From in or about 2002, up to and including in or about November 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in paragraphs 1 through 8 above, namely, the Lim Organization, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, willfully, and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity:



**The Pattern of Racketeering Activity**

10. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

**Racketeering Act One:**

**Conspiracy to Murder and Attempted Murder of Victim-1**

11. The defendants named below committed the following acts of racketeering, any one of which alone constitutes the commission of Racketeering Act One:

a. On or about May 9, 2003, in the Eastern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," the defendants, and others known and unknown, unlawfully, willfully, and knowingly conspired to murder Victim-1, in violation of New York State Penal Law, Sections 105.15 and 125.25.

b. On or about May 9, 2003, in the Eastern District of of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly attempted to murder Victim-1 and aided and abetted the attempted murder of Victim-1 in violation of New York State Penal Law, Sections 110.00, 125.25, and 20.00.

**Racketeering Act Two:**

**Conspiracy to Murder and Attempted Murder of Victim-2**

12. The defendants named below committed the following acts of racketeering, any one of which alone constitutes the commission of Racketeering Act Two:

a. In or about September 2003, in the Eastern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and YI TIAN ZHENG, a/k/a "Yi Tian," the defendants, and others known and unknown, unlawfully, willfully, and knowingly conspired to murder Victim-2, in violation of New York State Penal Law, Sections 105.15 and 125.25.

b. On or about September 27, 2003, in the Eastern District of of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and YI TIAN ZHENG, a/k/a "Yi Tian," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly attempted to murder Victim-2 and aided and abetted the attempted murder of Victim-2 in violation of New York State Penal Law, Sections 110.00, 125.25, and 20.00.

**Racketeering Act Three:**

**Conspiracy to Murder Victim-3**

13. From in or about April 2004, up through and including in or about May 2004, in the Eastern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," the defendants, and others known and unknown,

unlawfully, willfully, and knowingly conspired to murder Victim-3, in violation of New York State Penal Law, Sections 105.15 and 125.25.

**Racketeering Act Four:**  
**Operation Of an Illegal Gambling Business**

14. From in or about 2002, up through and including in or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong," the defendants, and others known and unknown, unlawfully, willfully, and knowingly conducted, financed, managed, supervised, directed, and owned all and part of an illegal gambling business, namely, various gambling parlors, in violation of New York State Penal Law Sections 225.00 and 225.05, which business involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and which business had been and remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day, in violation of Title 18, United States Code, Sections 1955 and 2.

**Racketeering Act Five:**  
**Extortion of Victim-4**

15. The defendants named below committed the following acts of racketeering, any one of which alone constitutes the commission of Racketeering Act Five:

**Conspiracy to Commit Extortion**

a. In or about July 2004, in the Eastern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," FNU LNU, a/k/a "Ah Liang," YI TIAN ZHENG, a/k/a "Yi Tian," and CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," the defendants, and others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit an act involving extortion, that is, to take, obtain, and withhold another's property wrongfully, by extortion, as that term is defined in New York State Penal Law Section 155.05(2)(e), to wit, LIM SHANG, LI YAN, FNU LNU, a/k/a "Ah Liang," YI TIAN ZHENG, CHEN YAN QING and others conspired and agreed to use fear of physical injury to force Victim-4 to pay protection money to the Lim Organization, in violation of New York State Penal Law, Sections 155.05, 155.40, and 105.10.

**Extortion**

b. In or about July 2004, in the Eastern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," FNU LNU, a/k/a "Ah Liang," YI TIAN ZHENG, a/k/a "Yi Tian," and CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," the defendants, and

others known and unknown, unlawfully, willfully, and knowingly committed an act involving extortion and attempted to commit an act involving extortion, that is, took, obtained, and withheld another's property wrongfully, by extortion, as that term is defined in New York State Penal Law Section 155.05(2)(e), to wit, LIM SHANG, LI YAN, FNU LNU, a/k/a "Ah Liang," YI TIAN ZHENG, CHEN YAN QING, and others used, and attempted to use, fear of physical injury to force Victim-4 to pay protection money to the Lim Organization, in violation of New York State Penal Law, Sections 110.00, 155.05 and 155.40.

**Racketeering Act Six:  
Conspiracy to Use Extortionate Means  
to Collect Extensions of Credit**

16. In or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," the defendant, and others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to participate in the use of extortionate means to collect and attempt to collect extensions of credit from numerous debtors, as those terms are defined in Title 18, United States Code, Sections 891(1), 891(5), and 891(7), and to punish such persons for the non-repayment of said extensions of credit, to wit, LIM SHANG and others agreed to use physical violence and economic harm and threats of physical violence and economic harm in order to collect extensions of credit, in violation of Title 18, United States Code, Section 894.

**Racketeering Act Seven:**  
**Extortionate Collection of Debt from Victim-5**

17. In or about June 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and LI GUO QIU, a/k/a "Jimmy," the defendants, and others known and unknown, unlawfully, willfully, and knowingly participated in the use of extortionate means to collect and attempt to collect extensions of credit from Victim-5, and to punish Victim-5 for the non-repayment of said extensions of credit, as those terms are defined in Title 18, United States Code, Sections 891(1), 891(5), and 891(7), to wit, LIM SHANG and LI GUO QIU used threats of physical violence and actual physical violence in order to collect extensions of credit from Victim-5, in violation of Title 18, United States Code, Sections 894 and 2.

**Racketeering Act Eight:**  
**Extortionate Collection of Debt from Victim-6**

18. In or about August 2004, in the Eastern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and MA YU DONG, a/k/a "Ah Dong," the defendants, and others known and unknown, unlawfully, willfully, and knowingly participated in the use of extortionate means to collect and attempt to collect extensions of credit from Victim-6, and to punish Victim-6 for the non-repayment of said extensions of credit, as those terms are defined in Title 18, United States Code, Sections 891(1), 891(5), and 891(7), to wit, LIM SHANG and MA YU DONG used threats of physical violence in

order to collect extensions of credit from Victim-6, in violation of Title 18, United States Code, Sections 894 and 2.

**Racketeering Act Nine:**  
**Trafficking in Counterfeit Goods**

19. In or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," and MA YU DONG, a/k/a "Ah Dong," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly trafficked and attempted to traffic in goods and services and knowingly used counterfeit marks on and in connection with such goods and services, in violation of Title 18, United States Code, Sections 2320 and 2.

(Title 18, United States Code, Section 1962(c).)

**COUNT TWO**

**Racketeering Conspiracy**

The Grand Jury further charges:

20. Paragraphs 1 through 8 and 11 through 19 of this Indictment are repeated, realleged and incorporated by reference as though fully set forth herein.

21. From in or about 2002, up through and including in or about November 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA

YU DONG, a/k/a "Ah Dong," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs 1 through 8 of this Indictment, namely, the Lim Organization, which enterprise was engaged in and the activities of which affected interstate and foreign commerce, unlawfully, willfully, and knowingly combined, conspired, confederated and agreed together and with each other to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which is set forth more fully in paragraphs 11 through 19 of this Indictment as Racketeering Acts One through Nine. It was further part of the conspiracy that the defendants agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

(Title 18, United States Code, Section 1962(d).)

### **COUNT THREE**

#### **Gambling Conspiracy**

The Grand Jury further charges:

22. From in or about 2002, up through and including in or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a



"Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," MA YU DONG, a/k/a "Ah Dong," ZHANG XIU QIAO, a/k/a "Duck Egg Chow," FNU LNU, a/k/a "Andy," FNU LNU, a/k/a "Ah Ling," FNU LNU, a/k/a "Jiang Li Ming," a/k/a "William Chen," QIU XING GUO, a/k/a "Yi Guo," FNU LNU, a/k/a "Li Zi," FNU LNU, a/k/a "Sister Ying," FNU LNU, a/k/a "Dong Gua," FNU LNU, a/k/a "Wu Hai," and FNU LNU, a/k/a "Aunt Wan Zheng," the defendants, and others known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1955.

23. It was a part and an object of the conspiracy that LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," MA YU DONG, a/k/a "Ah Dong," ZHANG XIU QIAO, a/k/a "Duck Egg Chow," FNU LNU, a/k/a "Andy," FNU LNU, a/k/a "Ah Ling," FNU LNU, a/k/a "Jiang Li Ming," a/k/a "William Chen," QIU XING GUO, a/k/a "Yi Guo," FNU LNU, a/k/a "Li Zi," FNU LNU, a/k/a "Sister Ying," FNU LNU, a/k/a "Dong Gua," FNU LNU, a/k/a "Wu Hai," and FNU LNU, a/k/a "Aunt Wan Zheng," the defendants, and others known and unknown, unlawfully, willfully, and knowingly would and did conduct, finance, manage, supervise, direct, and own all and part of an illegal gambling business, namely, various gambling parlors, in violation of New

York State Penal Law Sections 225.00 and 225.05, which business involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of it, and which business had been and had remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day, in violation of Title 18, United States Code, Section 1955.

Overt Acts

24. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 25, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and LI GUO QIU, a/k/a "Jimmy," had a telephone conversation about illegal gambling.

b. On or about April 25, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and QIU XING GUO, a/k/a "Yi Guo," had a telephone conversation about illegal gambling.

c. On or about April 30, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and FNU LNU, a/k/a "Li Zi," had a telephone conversation about illegal gambling.

d. On or about May 21, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and FNU LNU, a/k/a "Andy," had a telephone conversation about illegal gambling.

e. On or about May 27, 2004, LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," and FNU LNU, a/k/a "Ah Liang," had a telephone conversation about illegal gambling.

f. On or about June 3, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and FNU LNU, a/k/a "Jiang Li Ming," a/k/a "William Chen," had a telephone conversation about illegal gambling.

g. On or about June 4, 2004, LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," and ZHANG XIU QIAO, a/k/a "Duck Egg Chow," had a telephone conversation about illegal gambling.

h. On or about June 15, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and FNU LNU, a/k/a "Wu Hai," had a telephone conversation about illegal gambling.

i. On or about June 27, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and FNU LNU, a/k/a "Dong Gua," had a telephone conversation about illegal gambling.

j. On or about July 7, 2004, LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," and FNU LNU, a/k/a "Ah Ling," had a telephone conversation about illegal gambling.

k. On or about August 7, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and MA YU DONG, a/k/a "Ah Dong," had a telephone conversation about illegal gambling.

l. On or about September 3, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and FNU LNU, a/k/a

"Sister Ying," had a telephone conversation about illegal gambling.

m. On or about September 16, 2004, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," and YI TIAN ZHENG, a/k/a "Yi Tian," had a telephone conversation about illegal gambling.

n. On or about September 16, 2004, CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," had a conversation about illegal gambling.

(Title 18, United States Code, Section 371.)

**COUNT FOUR**

**Operation of Illegal Gambling Business**

The Grand Jury further charges:

25. From in or about 2002, up through and including in or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," MA YU DONG, a/k/a "Ah Dong," ZHANG XIU QIAO, a/k/a "Duck Egg Chow," FNU LNU, a/k/a "Andy," FNU LNU, a/k/a "Ah Ling," FNU LNU, a/k/a "Jiang Li Ming," a/k/a "William Chen," QIU XING GUO, a/k/a "Yi Guo," FNU LNU, a/k/a "Li Zi," FNU LNU, a/k/a "Sister Ying," FNU LNU, a/k/a "Dong Gua," FNU LNU, a/k/a "Wu Hai," and FNU LNU, a/k/a "Aunt Wan Zheng," the defendants, and others known and

unknown, unlawfully, willfully, and knowingly conducted, financed, managed, supervised, directed, and owned all and part of an illegal gambling business, namely, various gambling parlors, in violation of New York State Penal Law Sections 225.00 and 225.05, which business involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of it, and which business had been and had remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day.

(Title 18, United States Code, Sections 1955 and 2.)

**COUNT FIVE**

The Grand Jury further charges:

26. In or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," MA YU DONG, a/k/a "Ah Dong," LIN JIE, FNU LNU, a/k/a "Lao Zhong," LIAO MING, LAO CAI, FNU LNU, a/k/a "Ah Wei," YI DONG, HUINA CHEN, a/k/a "David," ZHI XIONG QIU, a/k/a "William," FNU LNU, a/k/a "Zhou Ping," and FNU LNU, a/k/a "Zhong Ge," the defendants, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 2320 of Title 18, United States Code.

27. It was a part and an object of the conspiracy that LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," LI YAN,

a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," MA YU DONG, a/k/a "Ah Dong," LIN JIE, FNU LNU, a/k/a "Lao Zhong," LIAO MING, LAO CAI, FNU LNU, a/k/a "Ah Wei," YI DONG, HUINA CHEN, a/k/a "David," ZHI XIONG QIU, a/k/a "William," FNU LNU, a/k/a "Zhou Ping," and FNU LNU, a/k/a "Zhong Ge," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly would and did traffic and attempt to traffic in goods and services and knowingly used counterfeit marks on and in connection with such goods and services, in violation of Title 18, United States Code, Section 2320.

Overt Acts

28. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, was committed in the Southern District of New York:

a. On or about June 4, 2004, LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," had a conversation relating to the trafficking of counterfeit goods.

b. On or about June 5, 2004, LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," and LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," had a conversation relating to the trafficking of counterfeit goods.

c. On or about August 23, 2004, HUINA CHEN, a/k/a "David," and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

d. On or about August 23, 2004, FNU LNU, a/k/a "Zhou Ping," and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

e. On or about August 28, 2004, FNU LNU, a/k/a "Lao Zhong," and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

f. On or about September 4, 2004, FNU LNU, a/k/a "Ah Wei," and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

g. On or about September 14, 2004, LIAO MING and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

h. On or about September 15, 2004, ZHI XIONG QIU, a/k/a "William," and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

i. On or about September 25, 2004, FNU LNU, a/k/a "Zhong Ge," and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

j. On or about September 26, 2004, YI DONG and MA YU DONG, a/k/a "Ah Dong," had a conversation relating to the trafficking of counterfeit goods.

k. On or about September 30, 2004, MA YU DONG, a/k/a "Ah Dong," LIN JIE, and FNU LNU, a/k/a "Lao Zhong," transported counterfeit goods from a warehouse in Queens to a store on West 28<sup>th</sup> Street in New York, New York.

1. On or about October 11, 2004, LAO CAI had a conversation relating to the trafficking of counterfeit goods.

(Title 18, United States Code, Section 371.)

**COUNT SIX**

The Grand Jury further charges:

29. In or about 2004, in the Southern District of New York and elsewhere, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," MA YU DONG, a/k/a "Ah Dong," LIN JIE, FNU LNU, a/k/a "Lao Zhong," LIAO MING, c, FNU LNU, a/k/a "Ah Wei," YI DONG, HUINA CHEN, a/k/a "David," ZHI XIONG QIU, a/k/a "William," FNU LNU, a/k/a "Zhou Ping," and FNU LNU, a/k/a "Zhong Ge," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly trafficked and attempted to traffic in goods and services and knowingly used counterfeit marks on and in connection with such goods and services, to wit, the defendants trafficked in counterfeit handbags, wallets, shoes, and other merchandise bearing Gucci, Fendi, Louis Vuitton, and other designer labels.

(Title 18, United States Code, Sections 2320 and 2.)

**FORFEITURE ALLEGATIONS  
RELATING TO COUNTS ONE AND TWO**

30. The allegations contained in Count One and Count Two of this Indictment are hereby repeated, realleged, and incorporated herein by reference as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963.



Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963, in the event of the defendants' conviction under Counts One and Two of this Indictment.

31. The defendants, LIM SHANG, a/k/a "Ah Ho," a/k/a "Lo Ban," a/k/a "Lin He," CHEN SHENG, a/k/a "Lo Ma," a/k/a "Xiao Ma," YI TIAN ZHENG, a/k/a "Yi Tian," LI YAN, a/k/a "Wai Sum Yu," a/k/a "Ah Fung," a/k/a "Tony," LI GUO QIU, a/k/a "Jimmy," CHEN YAN QING, a/k/a "Yan Qing," a/k/a "Ah Sheng," FNU LNU, a/k/a "Ah Liang," and MA YU DONG, a/k/a "Ah Dong":

a. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1); and

b. have property constituting, and derived from, proceeds obtained, directly and indirectly, from the aforesaid racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

32. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1) and (a)(3), include but are not limited to:

a. At least \$5 million.

Substitute Assets Provision

33. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants -

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

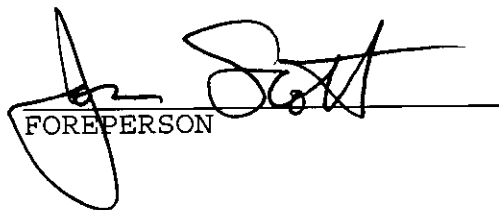
(d) has been substantially diminished in value; or

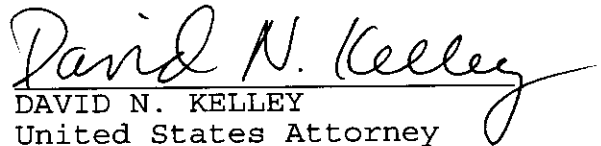
(e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

30. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

(Title 18, United States Code, Section 1963.)

  
FOREPERSON

  
DAVID N. KELLEY  
United States Attorney

a/k/a "William,"  
FNU LNU,  
a/k/a "Zhou Ping," and  
FNU LNU,  
a/k/a "Zhong Ge,"

Defendants.

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INDICTMENT

04 Cr.

(Title 18, United States Code, Sections 1962,  
371, 1955, 2320, 1963 and 2.)

DAVID N. KELLEY  
United States Attorney.

A TRUE BILL

Foreperson

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Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

LIM SHANG,  
a/k/a "Ah Ho,"  
a/k/a "Lo Ban,"  
a/k/a "Lin He,"  
CHEN SHENG,  
a/k/a "Lo Ma,"  
a/k/a "Xiao Ma,"  
YI TIAN ZHENG,  
a/k/a "Yi Tian,"  
LI YAN,  
a/k/a "Wai Sum Yu,"  
a/k/a "Ah Fung,"  
a/k/a "Tony,"  
LI GUO QIU,  
a/k/a "Jimmy,"  
CHEN YAN QING,  
a/k/a "Yan Qing,"  
a/k/a "Ah Sheng,"  
FNU LNU,  
a/k/a "Ah Liang,"  
MA YU DONG,  
a/k/a "Ah Dong,"  
ZHANG XIU QIAO,  
a/k/a "Duck Egg Chow,"  
FNU LNU,  
a/k/a "Andy,"  
FNU LNU,  
a/k/a "Ah Ling,"  
FNU LNU,  
a/k/a "Jiang Li Ming,"  
a/k/a "William Chen,"  
QIU XING GUO,  
a/k/a "Yi Guo,"  
FNU LNU,  
a/k/a "Li Zi,"  
FNU LNU,  
a/k/a "Sister Ying,"  
FNU LNU,  
a/k/a "Dong Gua,"  
FNU LNU,  
a/k/a "Wu Hai,"  
FNU LNU,  
a/k/a "Aunt Wan Zheng,"  
LIN JIE,  
FNU LNU,  
a/k/a "Lao Zhong,"  
LIAO MING,  
LAO CAI,  
FNU LNU,  
a/k/a "Ah Wei,"  
YI DONG,  
HUINA CHEN,  
a/k/a "David,"  
ZHI XIONG QIU,